



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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TO: Minerals File

FROM: Paul Baker, Senior Reclamation Biologist

RE: RDCC Comments on Proposed Revision, SF Phosphate Limited Company, Vernal Phosphate Operation, M/047/007, Uintah County, Utah

On January 11, 2002, the Division received two comments from the Resource Development Coordination Committee (RDCC) about the referenced revision to a large mine notice of intention. These comments concern paleontological localities in the project area and gaining approval from the Division of Air Quality. These comments have been previously addressed as follows:

Paleontology

The Bureau of Land Management's Environmental Assessment (EA) says:

The best potential for trackways in the Moenkopi Formation of the project area, exist where sandstones of less than 12 inches in thickness overlie shaley layers. In March of 1990, the mill sites were inspected for trackways and bone material by a qualified paleontologist and BLM representatives (BLM, 1990). It was concluded that the thin sandstone layer containing the known trackways does not extend onto the mill site. Therefore, paleontological resources would not be affected by any of the alternatives.

The legal description in the EA includes the areas mentioned in the comment letter from RDCC, and the Utah Geological Survey confirmed in a telephone conversation that the assessment done by the Bureau of Land Management is adequate.

Air Quality

According to the revision, the Division of Air Quality has issued a Title V Operating Permit which includes provisions for fugitive emissions associated with the dam and construction expansion. On February 8, 2002, I telephoned the Division of Air Quality asking whether a revision to the existing permit would be necessary. I was told that a revision should not be necessary given the type of construction being anticipated. The comment from RDCC was apparently a generic statement that did not necessarily apply to this operation.

jb
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